

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

**FILED**

AUG 11 2016

MAGISTRATE JUDGE IAIN D. JOHNSTON  
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA )

v. )

NEIL SHARMA,  
Defendant. )

Judge Iain D. Johnston  
Case No. 15 CR 50005

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**AGREED PROTECTIVE ORDER GOVERNING DOCUMENTS**

Upon the agreed motion of Ms. Niccole Ranz, pursuant to Fed. R. Crim. P. 16(d),  
it is hereby ORDERED:

All of the materials provided by Ms. Ranz in response to the defendant's subpoena seeking tax returns for 2014 and 2015 relative to In Home Medical Group and any individual or joint tax returns filed by Ms. Ranz (collectively, "the materials") are subject to this protective order and may be used by the defendant and defendant's counsel (defined as counsel of record in this case) and the government (defined as the United States' Attorney's Office) solely in connection with this criminal case, and for no other purpose, and in connection with no other proceeding, without further order of this Court.

Defendant and defendant's counsel and the government shall not disclose the materials or their contents directly or indirectly to any person or entity other than persons employed to assist in the defense or prosecution, persons who are interviewed as potential witnesses, counsel for potential witnesses, and other persons whom the

Court may authorize disclosure. Potential witnesses and their counsel may be shown copies of the materials as necessary to prepare the defense or prosecution, but may not retain copies without prior permission of the Court.

Defendant, defendant's counsel, the government, and authorized persons shall not copy or reproduce the materials except in order to provide copies of the materials for use in connection with this case by defendant, defendant's counsel, the government, and authorized persons. Such copies and reproductions shall be treated in the same manner as the original materials.

Defendant, defendant's counsel, the government, and authorized persons shall not disclose any notes or records of any kind they make in relation to the contents of the materials, other than to authorized persons, and all such notes are to be treated in the same manner as the original materials.


Before providing materials to an authorized person, the defendant, defendant's counsel, and the government must provide the authorized person with a copy of this Order.

Upon conclusion of all stages of this case, all of the materials and all copies made thereof shall be disposed of in one of three ways, unless otherwise ordered by the Court. The materials may be (1) destroyed; (2) returned to Attorney Carpenter, attorney for Ms. Ranz; or (3) retained in defense counsel's and the government's case file. The Court may require a certification as to the disposition of such materials. In the event the materials are retained by defense counsel or the government, restrictions of this Order continue in effect for as long as the materials are so maintained, and the materials may

not be disseminated or used in connection with any other matter without further order of this Court.

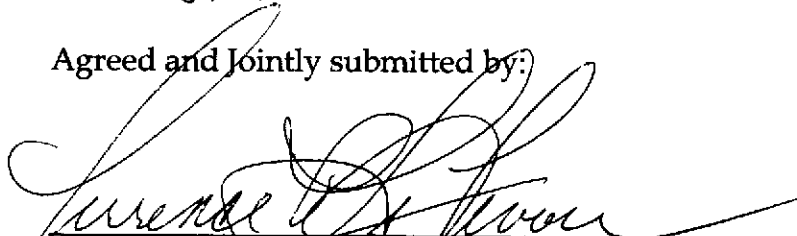
Nothing contained in this Order shall preclude any party from applying to this Court for further relief or modification of any provision hereof.

ENTER:

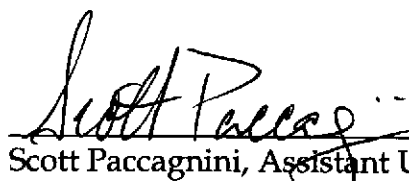
  
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IAIN D. JOHNSTON  
Magistrate Judge  
United States District Court  
Northern District of Illinois

Date: 8/11/16


Agreed and jointly submitted by:

  
\_\_\_\_\_  
Keith Spielfogel or Terrence Lefevour  
Attorneys for Defendant

Date: 8/11/16

  
\_\_\_\_\_  
Scott Paccagnini, Assistant U.S. Attorney

Date: 8/11/16

  
\_\_\_\_\_  
Kristin Carpenter  
Attorney for Ms. Niccole Ranz

Date: 8-11-16